



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 22, 2020

BY ECF

Hon. George B. Daniels
United States District Court
500 Pearl Street
New York, New York 10007

Hon. Denise Cote
United States District Court
500 Pearl Street
New York, New York 10007

Hon. Lewis J. Liman
United States District Court
500 Pearl Street
New York, New York 10007

Hon. P. Kevin Castel
United States District Court
500 Pearl Street
New York, New York 10007

Hon. Analisa Torres
United States District Court
500 Pearl Street
New York, New York 10007

Re: United States v. Jose Burgos, 19 Cr. 202 (GBD)
United States v. Michael Campana, 19 Cr. 859 (DLC)
United States v. Anthony Guzzone, 20 Cr. 354 (LJL)
United States v. Ronald Olson, 20 Cr. 356 (PKC)
United States v. Vito Nigro, 20 Cr. 370 (AT)

Dear Judges Daniels, Cote, Liman, Castel and Torres:

The Government respectfully submits this letter in accordance with the Court's procedure regarding cases involving multiple defendants in presumptively related cases arising out of a common scheme or events. (Rule 50.3.2, Local Rules S.D.N.Y./E.D.N.Y.). The Rule directs in pertinent part that, whenever it appears that cases may be presumptively related, the Government submit a letter to each of the judges concerned, attaching the relevant charging instruments. This letter is provided solely to provide notice to the Court pursuant to this Rule.

All five of the above-referenced defendants are charged with engaging in a scheme in which various employees of a financial media company (Guzzone and Campana) and a general contracting firm (Olson and Nigro) accepted unlawful payments from sub-contractors in exchange for construction jobs, and willfully omitted those payments from their income tax returns. Burgos facilitated the sub-contractors in making some of the unlawful payments and evaded taxes on the fees he received in exchange.

Defendant Jose Burgos pled guilty before Judge Daniels on March 21, 2019, under seal. That case was unsealed today, but no sentencing date has yet been set.

Defendant Michael Campana pled guilty before Judge Cote on November 26, 2019, and is scheduled to be sentenced before Judge Cote on July 24, 2020.

Defendant Anthony Guzzone waived indictment and was charged by information before the magistrate judge on July 14, 2020. No further proceedings have yet been scheduled.

Defendant Ronald Olson waived indictment and was charged by information before the magistrate judge on July 16, 2020, and is scheduled to plead guilty before Judge Castel on July 29, 2020.

Defendant Vito Nigro waived indictment and was charged by information before the magistrate judge today, and Judge Torres has scheduled an initial conference for August 3, 2020.

As noted above, this letter is submitted solely to provide notice to the Court pursuant to Local Rule 50.3.2.

Respectfully,

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